

KIRBY AISNER & CURLEY LLP  
*Proposed Attorneys for the Debtors*  
700 Post Road, Suite 237  
Scarsdale, New York 10583  
(914) 401-9500  
Dawn Kirby, Esq.  
[dkirby@kacllp.com](mailto:dkirby@kacllp.com)  
Erica R. Aisner, Esq.  
[eaisner@kacllp.com](mailto:eaisner@kacllp.com)

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
In re:

CDP HOLDINGS GROUP, LLC,

Chapter 11  
Case No. 22-41392-ESS

Debtor.

-----X  
In re:

NEIGHBORHOOD RADIOLOGY  
MANAGEMENT SERVICES, LLC,

Chapter 11  
Case No. 22-41393-ESS

Debtor.

-----X  
In re:

NEIGHBORHOOD RADIOLOGY  
SERVICES, P.C.,

Chapter 11  
Case No. 22-41394-ESS

Debtor.

-----X

**DECLARATION OF DANIEL DIPIETRO  
PURSUANT TO LOCAL BANKRUPTCY RULE 1007-4 AND IN  
SUPPORT OF FIRST DAY MOTIONS PURSUANT TO LOCAL RULE 9077-1**

DANIEL DIPIETRO, hereby declares under penalties of perjury:

I am the managing member of debtor CDP Holdings Group, LLC ("CDP") and debtor Neighborhood Radiology Management Services, LLC ("NRMS Management") and the Director of Operations of debtor Neighborhood Radiology Services, P.C. ("NRS PC") (CDP, NRMS

Management and NRS PC are sometimes collectively referred to as, the “Debtors”). As such, I am fully familiar with the Debtors’ operations, businesses and financial affairs.

I submit this Declaration pursuant to Rule 1007(d) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rules 1007-4 and 9077-1 of the Local Rules for the United States Bankruptcy Court for the Eastern District of New York and in support of the Debtors’ motions and applications (discussed in Part III).

Part I of this Declaration describes the Debtors’ businesses and circumstances leading to the commencement of these Chapter 11 cases. Part II provides information required by Local Bankruptcy Rule 1007-2. Part III provides relevant facts in support of the Debtors’ First Day Motions (defined herein).

## **Part I**

### ***The Debtors***

1. CDP is a Delaware limited liability company and NRMS Management is a New York limited liability company. They are what is commonly referred to in the diagnostic imaging industry as management service organizations or “MSOs” in that they historically provided administrative and operational non-medical services at various diagnostic imaging locations. A number of locations that CDP and NRMS previously operated have recently closed and/ or been sold and at present, there remains one (1) location currently operating in Forest Hills, New York (the “Site”).

2. NRS PC, which is owned by Dr. Matthew Diament, is a radiology practice through which Dr. Diament provides medical services at and for the Site.

### ***History***

3. In or around 2014, CDP purchased the assets of a number of affiliated entities

which were operating two radiology sites, one in Hewlett and another in Elmont, NY. Within months of the acquisition, litigation ensued when the sellers, specifically one of the shareholders, did not fulfill his obligations under the transactional documents which included leasing the assets performing radiology services at the CDP facilities on a go forward basis. This litigation continued for approximately two (2) years during which time CDP was forced to rely on the defendant, its adversary, to lease and pay for the provided services and employees at its newly acquired business locations under the very contracts which were being litigated in court. Ultimately the matter was settled but these delays and costs put unexpected, excessive and undue financial burdens on the new enterprise.

4. In 2015, NRMS Management, as the MSO, together with NRS, opened a third site on Metropolitan Avenue in Forest Hills, Queens and in January and December of 2017, the assets of a fourth and fifth operation in Astoria and another in Forest Hills, Queens were added to the enterprise. Unfortunately, once the Debtors began operating the last acquired site in Forest Hills they realized that revenues were significantly lower than historical data reported in pre-sale due diligence. In addition, significant other operational unlawful irregularities perpetrated by the former owners came to light as well. The Debtors cooperated with law enforcement as they investigated the prior owner, Payam Toobian who was ultimately arrested and charged with various violations of law.

5. Meanwhile, Toobian commenced an action against NRMS seeking recovery on amounts allegedly due and owing until the Asset Purchase Agreement. NRMS filed a countersuit in that action asserting breach of contract, indemnification and attorneys' fees claims and sought damages in an amount not less than \$4,000,000. Despite NRMS and its affiliates having nothing to do with Toobian's bad acts, all of which were perpetrated prior to the Debtors' acquisition of

the site, the merely proximity of the Debtors to the operation and Toobian was enough to cause irreparable harm to the Debtors.

6. In or about the same time, the Debtors were forced to terminate their billing agreement with their account receivable management vendor due to contractual breaches and poor performance. The Debtors was again required to commence and prosecute costly litigation while at the same time transition to a new billing service, continue to work with the Attorney General and prosecute the lawsuit against Toobian. The Debtors ultimately accepted a monetary settlement from the billing company but the recovery did not fully compensate the Debtors for the lost revenues.

7. Despite these challenges, the Debtors' continued their effort to expand their footprint and in 2019 they commenced build-out on a new, state of the art, facility in Sunnyside, Queens. During this same time, growth required additional hiring and at its peak, the Debtors collectively employed approximately 160 employees. Meanwhile, although slightly behind schedule, the new Sunnyside location was in the "home stretch" of construction and was projected to be completed in early 2020. In order to meet the needs of this rapidly growing enterprise, substantial investments were also undertaken for upgrades in critical infrastructure. These commitments resulted in the aggregate of approximately \$8,000,000 in new debt.

8. Unfortunately, just as the Debtors began to see the light at the end of the tunnel, the COVID-19 pandemic hit. Construction at Sunnyside was halted, significant portions of staff were furloughed, and the Debtor suffered a decline in revenue of approximately 80%. The Debtors were able to keep the doors open with the assistance of government subsidies and financing (e.g. PPP and EIDL) but as the summer of 2020 approached, the Debtor was forced to permanently shutter its Elmont location as well as one of its two sites in Forest Hills.

9. Like most small businesses during the pandemic -- the Debtors were in survival mode. Significant efforts were employed to sell unprofitable sites but buyers were few and far between. As the debts, both secured and unsecured mounted, what buyers did express interest were only willing to pay a fraction of the true values of the assets and operations and an even smaller fraction of what was needed to clear liens.

10. The Debtor closed on the sale of its Astoria location for a mere \$215,000 (approx..) in cash plus additional consideration in the form of a settlement payment with the landlord who was owed significant arrears. In a non-pandemic environment, the sale of this site would have been worth at least twice that amount, if not more.

11. The Debtor also made the very difficult decision not to open its new site in Sunnyside. The Debtor simply lacked the capital needed to complete construction and open the doors. Instead, efforts were focused on finding a buyer and a sale transaction that would help repay the mounting creditors related to that location. Numerous large radiology site operators as well as several major local hospital systems conducted due diligence. When no buyer materialized a deal was ultimately struck with the landlord for \$500,000 in exchange for a consensual termination of the lease and the proceeds were remitted to the construction lender at that site who was owed nearly \$2 million. In addition, the obligation due to Siemens who financed a majority of the medical equipment on site were released which alleviated several millions of dollars more in debt across the enterprise.

12. Also, in October of 2021, the Debtor received a non-renewal notice from one of its largest insurance payors, Health First. Health First represents approximately 30% of the Debtors' revenues. The justification for non-renewal was alleged irregularities with claim submission. However, each identified issue has been disproven and despite dogged efforts by the

Debtors to resolve the matter, the notice has yet to be revoked.

13. Earlier this month the Debtors made the difficult decision to close their Hewlett location and possession of the premises was surrendered to the landlord on June 6, 2022.

14. The Debtors' remaining location in Forest Hills continues to struggle every day. It now must carry debt which was accumulated by an enterprise more than three times its size which is obviously impossible. Every day is a struggle to maintain critical relationships with suppliers and service providers.

15. The Debtors continue to search for a solution for its remaining site. While a sale is still a possibility, the potential of a strategic transaction with a complimentary business is also being explored. Specifically, if the Forest Hills facility and practice was converted to a multi-specialty facility, its potential for expanded revenues is substantially increased. Such a conversion will take time to accomplish and likely will require a local strategic partner.

16. The Debtors require the protection of the Bankruptcy Court in order to help sustain and protect their operations until such time as a sale or restructuring can be accomplished. Both of these options are being pursued on a dual track and the Debtors are committed to finding a solution which will benefit their estates, their respective creditors and the communities that they serve.

17. The Declarant submits that the best interests of the estates and their creditors will be served through these Chapter 11 cases and the Debtors remaining in possession of their assets and managing their own affairs, under the supervision of the Court, as debtors-in-possession.

## **Part II**

### **INFORMATION REQUIRED BY LOCAL BANKRUPTCY RULE 1007-2**

18. In addition to the foregoing, Local Bankruptcy Rule 1007-2 requires certain information related to the Debtors, which is set forth below.

- a. **Local Rule 1007-2(a)(1):** As set forth at length above, the Debtors operate a diagnostic imaging center in Forest Hills.
- b. **Local Rule 1007-2(a)(2):** This case was not originally commenced under Chapter 7 or 13 of title 11 of the United States Code, 11 U.S.C. §§ 101, et seq., as amended by the Bankruptcy Abuse Prevention and Consumer Protection Act of 2005.
- c. **Local Rule 1007-2(a)(3):** Upon information and belief, no committee or professionals were employed prior to the filing of the Order for relief.
- d. **Rule 1007-2(a)(4):** A list of the holders of the 20 largest general unsecured claims for each Debtor is attached as Exhibit “A”.
- e. **Local Rule 1007-2(a)(5):** A list of the 5 largest secured creditors for each Debtor is attached as Exhibit “B”.
- f. **Local Rule 1007-2(a)(6):** A recent balance for the Debtors sheet is not currently available.
- g. **Local Rule 1007-2(a)(7):** There are no publicly held securities of the Debtors.
- h. **Local Rule 1007-2(a)(8):** None of the Debtors property is in possession of a receiver or custodian.
- i. **Local Rule 1007-2(a)(9) and (10):** The Debtors lease their business premises, CDP is the lessee. The Debtors’ electronic books and records are located in Elmsford, New York and the remainder of their assets are located in Forest Hills, New York. The Debtors have no assets located outside the territorial limits of the United States.

j. **Local Rule 1007-2(a)(11):** There are currently 10 pending lawsuits against the Debtors:

- i. *Vanguard Cleaning Systems vs. CDP Holdings Group, LLC*, Supreme Court of the State of New York, Nassau County, Index No: 605064/2021;
- ii. *America's Imaging Center, Inc. and Payam Toobian DR v. Neighborhood Radiology Management Services, LLC*, Supreme Court of the State of New York, Nassau County, Index No: 607547/2020;
- iii. *Siemens Financial Services, Inc. v. Neighborhood Radiology Management Services, LLC, NRMS Greenpoint Realty, LLC, Daniel DiPietro, Matthew Diament and Neighborhood Radiology Services P.C.*, Supreme Court of the State of New York, Nassau County, Index No: 608087/2021;
- iv. *Alpha Medical Equipment of New York, Inc. v. Neighborhood Radiology Management Services, LLC*, Supreme Court of the State of New York, Nassau County, Index No: 65290/2022;
- v. *Sigma Imaging Technologies, Inc. v. Neighborhood Radiology Management Services, LLC*, Supreme Court of the State of New York, Nassau County, Index No: 651603/2021;
- vi. *227 Franklin Realty LLC v. Daniel DiPietro, Matthew Diament, M.D., and Neighborhood Radiology Services, P.C.*, Supreme Court of the State of New York, Nassau County, Index No: 614830/2021;
- vii. *Bessie Despotopoulos and George Despotopoulos v. Glenn Schwartz MD and Neighborhood Radiology Services PC*, Supreme Court of the State of New York, Queens County, Index No: 716651/2021;
- viii. *Ramonita Barrios v. Abul Azad, Howard Gelber, Jason Grotas, I'Kyori Swaby, Shava Ni Thakker, Farima OB/GYN Center, Neighborhood Radiology Services PC, St. John's Episcopal Hospital, Urologic Surgical Care LLC, and Mount Sinai South Nassau*, Supreme Court of the State of New York, Queens



County, Index No: 705977/2022;

ix. *Danziger & Markhoff LLP v. Neighborhood Radiology Services PC*, Supreme Court of the State of New York, County of Westchester, Index No: 58272/2020; and

x. *Ultrasound Solutions Corp. v. Neighborhood Radiology Services, PC, d/b/a Neighborhood Radiology of Hewlett, d/b/a Neighborhood Radiology of Elmont, d/b/a Neighborhood Radiology of Astoria, d/b/a Neighborhood Radiology of Forest Hills, CDP Holdings Group, LLC, d/b/a Neighborhood Radiology Management, Neighborhood Radiology Management Services, LLC, Neighborhood Radiology Management Services II LLC, Neighborhood Radiology Management Services III LLC, and Neighborhood Radiology Management Services IV LLC*, District Court of the County of Nassau, Third District: Great Neck, Index No: *unknown*.

k. **Local Rule 1007-2(a)(xiii):** The Debtor's senior management consists of Declarant and Matthew Diamant, MD.

l. **Local Rule 1007-2(b)(1)-(3):** The Debtor's estimated payroll to non-insider, non-officer employees for the thirty (30) day period following the Chapter 11 petition is approximately \$107,657. The Debtor's estimated payroll to insider officers for the thirty (30) day period following the Chapter 11 petition is \$17,231. A schedule of anticipated income and expenses over the same thirty (30) day period is annexed to the cash collateral motion.

### **Part III**

#### **FIRST DAY MOTIONS AND APPLICATION FOR HEARING ON SHORTENED NOTICE**

19. Contemporaneously with the filing of this Declaration and in connection with the filing of this Chapter 11 case, the Debtors expect to file the following:

a. Motion for Order Seeking Authority, on Shortened Notice, (I) to Use Cash Collateral Pursuant to Bankruptcy Code Section 363(C)(2) and Granting Adequate Protection Therefor, (ii) Scheduling a Final Hearing; and

b. Motion for an Order Authorizing Payment of Certain Pre-Petition Wages, Salaries, Employee Benefits and other related relief;

c. Motion for an Order Extending Time for the Debtors to File Schedules of Assets and Liabilities and Statements of Financial Affairs;

d. Motion of the Debtor for Entry of An Order Authorizing the Maintenance of (i) Existing Bank Accounts and Banking Practices and (ii) Existing Cash Management Systems; and

e. Application for Joint Administration of Chapter 11 Cases, for Procedural Purposes Only.

(collectively, the “First Day Motions”).

20. The relief sought in the First Day Motions is immediately necessary to enable the Debtors to operate effectively as a debtors-in possession following the commencement of their Chapter 11 cases.

21. I submit that the relief request in the First Day Motions should be heard and determined on an expedited basis in order to allow the Debtors to continue their normal business operations without any interruption in their ability to receive revenue, pay bills and pay employees, which interruption that would cripple the Debtors’ ability to successfully reorganize.

22. I submit believe that good cause exists to shorten notice of First Day Motions which typically requires a minimum of twenty (20) days’ notice as provided for in Federal Rule of Bankruptcy Procedure 2002.

23. I have reviewed each of the First Day Motions and Orders and the facts set forth there in are true and correct to the best of my knowledge, information and belief.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury that the foregoing is true and correct.

Dated: Forest Hills, New York  
June 17, 2022

/s/ Daniel DiPietro  
Dan DiPietro

EXHIBIT “A”

Twenty Largest Unsecured Creditors

**Fill in this information to identify the case:**Debtor name CDP Holdings Group, LLCUnited States Bankruptcy Court for the: Eastern District of New YorkCase number (If known): 1-22-41392☐ Check if this is an amended filing**Official Form 204****Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders**

12/15

A list of creditors holding the 20 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an *insider*, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
1	Vibrant Credit Union 6600 44th Avenue Moline, IL, 61265		PPP Loan	Disputed Contingent			1,672,500.00
2	Vibrant Credit Union 6600 44th Avenue Moline, IL, 61265		PPP Loan	Disputed Contingent			1,415,205.00
3	227 Franklin Realty, LLC 2999 Long Beach Rd.  Oceanside, NY, 11572		Lease Arrears	Unliquidated Contingent			752,090.37
4	James McCleavey MD 8370 Dario Way  Fort Myers, FL, 33912		Promissory Note				227,955.00
5	Howard Gelber, MD 243 Hedge Lane  Hewlett, NY, 11557		Promissory Note				227,955.00
6	Glenn Schwartz, MD 874 Newburg Avenue  Valley Stream, NY, 11581		Promissory note				227,955.00
7	TESS MITTMAN - DANI'S STRIKE ZONE C/O DIANE HOROWITZ 20 VILLAGE AVENUE Elmont, NY, 11003		Lease Arrears				215,440.00
8	Abrams, Fensterman, LLP 3 Dakota Drive, Suite 300  Lake Success, Ny, 11042		Legal Fees				213,088.27

Debtor CDP Holdings Group, LLC  
NameCase number (if known) 1-22-41392

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
9	PSEG 0768-1006-71-9 PO Box 9039  Hicksville, Ny, 11802-9039		Utilities				117,558.11
10	PSEG - 0475-5000-05-8 P.O. Box 888  Hicksville, Ny, 11802-888		Utilities				72,763.35
11	Rivkin Radler 926 RXR Plaza  Uniondale , ny, 11556-0926		Legal Fees				63,529.05
12	Insight Direct USA Inc. 6820 S Harl Ave  Tempe, AZ, 85283						56,514.58
13	New York State Unemployment Insurance PO Box 4301 Binghamton, NY, 13902		Taxes & Other Government Units				47,313.14
14	RIDE RITE TRANSPORTATION 22-06 CRESCENT ST.  Astoria, NY, 11105		Suppliers or Vendors				47,036.96
15	Chubb 1133 Avenue of the Americas  New York, NY, 10036		Insurance				43,686.16
16	Nuance Communications Inc. 1 Wayside Road  Burlington, MA, 01803		Suppliers or Vendors				35,936.52
17	Cigna Health 140 E 45th Street 8th Floor New York, NY, 10017		Suppliers or Vendors				31,000.00
18	PARKING SYSTEMS P.O. BOX 160  Valley Stream, NY, 11582		Suppliers or Vendors				18,360.00
19	Sigma Imaging Technologies, Inc 400 Highland Drive, Suite 400B  Westhampton, NJ, 8060		Suppliers or Vendors				15,955.00
20	De Lage Landen c/o Advanced Recovery Systems 901 E. 8th Avenue, Suite 206 King Of Prussia, PA, 19406		Suppliers or Vendors				14,399.36

**Fill in this information to identify the case:**Debtor name Neighborhood Radiology Management Services, LLCUnited States Bankruptcy Court for the: Eastern District of New YorkCase number (If known): 1-22-41393☐ Check if this is an amended filing**Official Form 204****Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders**

12/15

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	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
1	MLMIC Insurance Company 2 Park Avenue New York, NY, 10016		Suppliers or Vendors				388,139.00
2	A.J. Richards & Sons, Inc. 150 Price Parkway Farmingdale, NY, 11735		Rental Arrears				382,565.23
3	Alpha Medical Equipment of N.Y., Inc. 10-12 Pine Court New Rochelle, NY, 10801		Suppliers or Vendors				334,221.05
4	Vibrant Credit Union 6600 44th Avenue Moline, IL, 61265		PPP Loan	Disputed Contingent			306,087.00
5	Vibrant Credit Union 6600 44th Avenue Moline, IL, 61265		PPP Loan	Disputed Contingent			295,000.00
6	Sigma Imaging Technologies, Inc. 400 Highland Drive Suite 400B Mount Holly, NJ, 8060		Suppliers or Vendors	Disputed Unliquidated Contingent			271,610.09
7	Mintz Levin Chrysler Center 666 Third Avenue New York, NY, 10017		Legal Fees				256,518.46
8	626 Holdings, LLC 1395 NW 17th Ave Ste 113-114 Delray Beach, FL, 33445		Suppliers or Vendors				147,584.54

Debtor Neighborhood Radiology Management Services, LLCCase number (if known) 1-22-41393

Name

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
9	Consolidate Edison Comp of NY Inc. 4 Irving Place RM 1875 attn: Bankruptcy Dept. New York, NY, 10003		Utilities				89,847.80
10	Consolidate Edison Comp of NY Inc. 4 Irving Place RM 1875 attn: Bankruptcy Dept. New York, NY, 10003		Utilities				89,794.15
11	Hologic Inc 250 Campus Drive Marlborough, MA, 1752		Suppliers or Vendors				74,146.24
12	GE Healthcare-Pharmacy RLS USA INC PO Box 640200 Pittsburgh, PA, 15264		Suppliers or Vendors				64,552.46
13	ScriptSender 319 Clematis St Ste 406 West Palm Beach, FL, 33401		Suppliers or Vendors				60,187.50
14	Advocate Attn: Jigar Patel 10567 Sawmill Pkwy, Suite 100 Powell, OH, 43065		Suppliers or Vendors				59,618.90
15	Chubb 55 Water Street New York, NY, 10041		Suppliers or Vendors				57,771.74
16	Consolidate Edison Comp of NY Inc. 4 Irving Place RM 1875 attn: Bankruptcy Dept. New York, NY, 10003		Utilities				47,170.57
17	Guerbet LLC 214 Carnegie Center, Suite 300 Princeton, NJ, 8540		Suppliers or Vendors				40,143.81
18	RingCentral Inc 20 Davis Drive Belmont, CA, 94002		Utilities				28,532.50
19	Consolidate Edison Comp of NY Inc. 4 Irving Place RM 1875 attn: Bankruptcy Dept. New York, NY, 10003		Utilities				26,464.87
20	Danziger & Markhoff LLP 1133 Westchester Avenue Suite N208 White Plains, NY, 10604		Legal Fees				26,171.25



**Fill in this information to identify the case:**Debtor name Neighborhood Radiology Services, P.C.United States Bankruptcy Court for the: Eastern District of New YorkCase number (if known): 1-22-41394☐ Check if this is an amended filing**Official Form 204****Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders**

12/15

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	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
1	Siemens Financial Services, Inc. 170 Wood Ave. South Iselin, NJ, 08830		Corporate Guaranty	Unliquidated Contingent			1,220,000.00
2	Dell Financial Services LLC 99355 Collections Center Drive Chicago, IL, 60693		Corporate Guaranty	Unliquidated Contingent			349,200.53
3	Vibrant Credit Union 6600 44th Avenue Moline, IL, 61265		PPP Loan	Disputed Contingent			317,500.00
4	227 Franklin Realty, LLC 2999 Long Beach Road Oceanside, NY, 11572		Corporate Guaranty	Unliquidated Contingent			282,648.00
5	Vibrant Credit Union 6600 44th Avenue Moline, IL, 61265		PPP Loan	Disputed Contingent			166,600.00
6	Guerbet LLC 214 Carnegie Center Suite 300 Princeton, NJ, 08540			Disputed			65,601.51
7	Hudson Valley Interventional Medicine 185 Rykowski Lane Ste 101 Middletown, NY, 10941						65,242.50
8	Luminate Bank 5900 Green Oak Dr #100 Hopkins, MN, 55343		Business Loan				61,407.30

Debtor

Neighborhood Radiology Services, P.C.

Case number (if known) 1-22-41394

Name

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
9	CBIZ Insurance Services Inc. Attn: Accounting 44 Baltimore Street Cumberland, MD, 21502						39,508.32
10	Cisco Systems Capital 1111 Old Eagle School Road Wayne, PA, 19087		Corporate Guaranty	Unliquidated Contingent			27,143.00
11	Danziger & Markoff LLP 1133 Westchester Avenue West Harrison, NY, 10604		Legal Fees	Unliquidated			26,171.25
12	Island Valet Service, Inc. 28 Fourth Street Valley Stream, NY, 11582		Suppliers or Vendors	Unliquidated Contingent			18,360.00
13	Premier Imaging Associates, PLLC 260 Route 303 North West Nyack, NY, 10994						4,350.00
14	Ultrasound Solutions Corp. 123 Comac Street Ronkonkoma, NY, 11779						0.00
15							
16							
17							
18							
19							
20							

**EXHIBIT "B"**  
**Secured Creditors**

<b>Creditor</b>	<b>CDP Group Holdings LLC</b>	<b>Neighborhood Radiology Management Services LLC</b>	<b>Neighborhood Radiology P.C.</b>
Luminate Bank f/k/a American Equity Bank 5900 Green Oak Drive, Ste 100 Minnetonka, MN 55543		✓	✓
Northpoint Commercial Credit LLC 6465 Wayzata Blvd., Suite 760 Minneapolis, MN 55426		✓	✓
Northpoint Commercial Credit, LLC 6465 Wayzata Blvd., Suite 760 Minneapolis, MN 55426	✓	✓	✓
U.S. Small Business Administration 2 North Street, Ste. 320 Birmingham, AL 35203	✓	✓	✓
Signature Financial LLC 225 Broadhollow Road, suite 132W Melville, NY 11747	✓	✓	✓
Tandem Finance Inc. 25700 Interstate 45, Suite 4084 Woodlands, TX 77386	✓		
Cisco Systems Capital CRP 1111 Old Eagle School Road Wayne, PA 19087	✓		